

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
(READING)**

IN RE:)	
JONATHAN DAVID RINEHIMER,)	CASE NO.: 24-14337-pmm
AKA JONATHAN D. RINEHIMER,)	CHAPTER 13
AKA JONATHAN RINEHIMER,)	JUDGE PATRICIA M. MAYER
)	
DEBTOR.)	
)	
U.S. BANK TRUST NATIONAL)	
ASSOCIATION, AS TRUSTEE OF CVF III)	
MORTGAGE LOAN TRUST II AS SERVICED)	
BY NEWREZ LLC D/B/A SHELLPOINT)	
MORTGAGE SERVICING,)	
)	
CREDITOR.)	
)	
JONATHAN DAVID RINEHIMER, DEBTOR,)	
AND SCOTT F. WATERMAN, TRUSTEE)	
)	
RESPONDENTS.)	

OBJECTION TO CONFIRMATION

COMES NOW U.S. Bank Trust National Association, as Trustee of CVF III Mortgage Loan Trust II as serviced by NewRez LLC d/b/a Shellpoint Mortgage Servicing by and through its counsel, and files this written Objection to Confirmation of Debtor's Chapter 13 Plan pursuant to 11 U.S.C. §1324 and Bankruptcy Rule 3015(f), and as grounds therefore states:

1. U.S. Bank Trust National Association, as Trustee of CVF III Mortgage Loan Trust II as serviced by NewRez LLC d/b/a Shellpoint Mortgage Servicing ("Creditor") is a secured creditor holding a secured claim against Debtor. The amount of the claim will be set forth in Creditor's Proof of Claim that will be filed but the claims bar date of February 13, 2025.
2. Creditor has a security interest in the property known as **531 Brown Avenue, Bangor, PA 18013.**

3. Debtor's Chapter 13 petition and proposed Plan has arrears listed at \$5,474.76 to be paid by the Trustee and Debtor to make the normal monthly mortgage payment. However, the Plan does not address taxes and insurance as this loan matures on November 1, 2028, which is during the life of the Plan.

4. As of December 5, 2024, the unpaid principal balance is \$3,573.39.

5. The Chapter 13 Plan does not comply with 11 U.S.C. §1322 and 11 U.S.C. §1325 and is not accepted by Creditor.

WHEREFORE, Creditor respectfully requests that this Honorable Court decline Confirmation of Debtor's proposed Plan and grant such further and other relief as is just.

Respectfully submitted,

/s/ Joshua I. Goldman
Joshua I. Goldman, Esq.
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Counsel for Creditor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Objection to Confirmation has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this 3rd day of February 2025:

DEBTOR

JONATHAN DAVID RINEHIMER
531 BROWN AVENUE
BANGOR, PA 18013

ATTORNEYS FOR DEBTOR

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TRUSTEE

SCOTT F. WATERMAN [CHAPTER 13]
CHAPTER 13 TRUSTEE
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U.S. TRUSTEE

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Respectfully submitted,

/s/ Joshua I. Goldman

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